

Comments on Proposed Biomass Regulations

DOER's proposed regulations must be thrown out until the following happens:

1. The Manomet Biomass Study has never been peer reviewed. Other peer reviewed studies such as the one by Professor Jay O'Laughlin from the University of Idaho and the one by Futuremetrics have exposed the flaws and mistakes in the Manomet Study. Thus, the Manomet Study must be peer reviewed.
2. While this agency does have the right to set standards for energy production and utilization, it does not have the regulatory authority or jurisdiction to govern any aspect of timber harvesting. As far as any additional regulations governing forest biomass harvesting, this is in the province of the Massachusetts Forestry Committee which is specified in Section 41 of the Ch.132 Forest Cutting Practices Act. Thus the MA Forestry Committee must be reappointed and review any proposed regulations in regards to timber harvesting.
3. The federal EPA is undergoing a 3 year review of biomass utilization to see what if any regulations they will promulgate. DOER should wait until EPA is finished with their study before proposing any new regulations.
4. MA DOER should be working with the other states that are in the RGGI to promulgate the same region wide regulations. No other state in the country is proposing anything like DOER's job killing regulations.

Increasing markets for forest biomass would be great for the forestry sector. More information can be found here on my blog: <http://northquabbinforestry.com/2010/12/14/forest-biomass-markets-promote-great-forestry/>

Finally, MA DOER has already cost over 2,000 jobs in the forestry/biomass sector. But you can fix this by doing the right thing and reject all these regulations.

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